

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

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THOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
W.D. OF TN, MEMPHIS

Alan Keith Jean, Jr.

(Enter above the full name of the plaintiff
or plaintiffs in this action.)

vs.

Dyer County Law Enforcement Center (employees)
Ricky Greer
Joe Paschall

(Enter above the full name of the defendant
or defendants in this action.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS UNDER 42 U.S.C., §1983

I. Previous Lawsuits

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? Yes () No ()
- B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit

Plaintiffs: ~~Alan Keith Jean, Jr.~~

Defendants: ~~Dyer County Law Enforcement Center~~

2. Court (if federal court, name the district; if state court, name the county):

3. Docket Number: _____

4. Name of judge to whom case was assigned: _____

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

6. Approximate date of filing lawsuit: _____

7. Approximate date of disposition: _____

- II. Place of Present Confinement: Dyer County Jail
- A. Is there a prisoner grievance procedure in the institution? Yes ☒ No ☐
- B. Did you present the facts relating to your complaint in the state prisoner grievance procedure? Yes ☒ No ☐
- C. If your answer is Yes:
1. What steps did you take? I turned in a grievance on 3/11/2013 and have yet to get a grievance number or a response.
 2. What was the result? It apparently disappeared.
- D. If your answer is No, explain why not: _____

- III. Parties
- (In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)
- A. Name of Plaintiff Alan Keith Jean, Jr.
- Address 401 E. Cedar St. Dyersburg TN 38024
- (In item B below, place the full name of the defendant in the first blank, his official position in the second blank, and his and his place of employment in the third blank. Use Item C for the names, positions, and places of employment of an additional defendants.)
- B. Defendant Ricky Greer is employed as _____
- at Dyer County Jail
- C. Additional Defendants: Joe Paschall employed at _____
- Dyer County Jail

IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.

I arrived at Dyer County Jail on 12/05/2012 and was placed in G-pod. While housed in G-pod I began having problems with 2 other inmates housed in G-pod, Kelly Brandon and Wright Pierson. This was made known to the First Shift Supervisor, Corporal Laura Simpson on 1/03/2013, and was subsequently moved to another unit to prevent further incident.

I have been housed in D-pod since 1/03/2013. On 3/09/2013 I was returning from visiting my family. C.O.'s Greer and Paschall were escorting me back to my unit and had to door to G-pod opened knowing full and well that I had problems with multiple inmates housed there. While holding

cont.
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G-pods door open, Wright Pierson ran out of the unit and "swung" on me. I immediately fled, however, I continue to receive verbal threats while housed here.

correction: The two named persons involved are Brandon Pierson and Kelly Wright.

It was Brandon Pierson who assaulted me.

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments.

Cite no cases or statutes.

I would like both of the listed employees to receive unpaid suspensions for a period of time determined by the court. I would like to be IMMEDIATELY transferred to another facility to prevent acts of reprisal from the above named employees and to insure my safety.

I now suffer from insomnia due to the trauma I have undergone and wish for compensatory damages to be assessed by the judge.

VI. Jury Demand

I would like to have my case tried by a jury. Yes () No ☒.

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of our information, knowledge, and belief.

Signed this 17th day of March, 20 13.

Alan Jan

(Signature of Plaintiff/Plaintiffs)